

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SAGI GINGER,

Plaintiff,

v.

ORLY GINGER,

Defendant.

Civ. No.: 14-5683 (KBF)

**NOTICE OF MOTION TO  
DISQUALIFY SAGI COUNSEL  
PURSUANT TO THE  
WITNESS-ADVOCATE RULE**

TAKE NOTICE, that upon the Declaration of Yoav M. Griver, dated November 18, 2014, and the exhibits attached thereto; the accompanying memorandum of law dated November 18, 2014; and all pleadings and proceedings had herein, defendant Orly Genger shall make a motion before the Honorable Katherine B. Forrest, United States District Judge, at the United States Court House, 500 Pearl Street, New York, New York, for an order: (i) disqualifying John Dellaportas as counsel for plaintiff Sagi Genger pursuant to the witness advocate rule; and (ii) for such other and further relief as the Court deems just and proper.

TAKE FURTHER NOTICE, that, opposing papers, if any, shall be served not later than December 3, 2014 and reply papers, if any, shall be served not later than December 10, 2014.

Dated: New York, New York  
November 18, 2014

ZEICHNER ELLMAN & KRAUSE LLP

By:

  
Yoav M. Griver

Bryan D. Leinbach

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Orly Genger

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